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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 18-465 MMC
)	
Plaintiff,)	STIPULATION REGARDING PROPOSED PRE-
)	TRIAL SCHEDULE AND PROPOSED ORDER
v.)	
)	
UNITED MICROELECTONICS)	
CORPORATION, INC.; FUJIAN JINHUA)	
INTEGRATED CIRCUIT, CO., LTD.; CHEN)	
ZHENGKUN, a.k.a. STEPHEN CHEN; HE)	
JIANTING, a.k.a. J.T. HO; and WANG)	
YUNGMIN, a.k.a. KENNY WANG.)	
)	
Defendants.)	

Pursuant to the Court's order of September 9, 2020 (Dkt No. 131), the United States and
defendants Fujian Jinhua Integrated Circuit Co. ("Jinhua") and United Microelectronics Corporation,

STIPULATION REGARDING PRE-TRIAL SCHEDULE
CR 18-465 MMC

Inc. (“UMC”) jointly propose the following pre-trial schedule for the Court’s consideration:

Event	Date
U.S. shall produce all <i>Brady, Giglio, Jencks</i> (excluding grand jury testimony), and Rule 16(a) Materials (except expert disclosures)	December 21, 2020
Government Expert Disclosures (Rule 16(a)(1)(G))	April 2, 2021
Dispositive and Discovery Motion Deadline (including all Rule 12(b)(3) Motions). ¹	April 23, 2021
Briefing and Hearing Schedules on Dispositive and Discovery Motions	To be set by Court
Defense Expert Disclosures (Rule 16(b)(1)(C))	April 30, 2021
Government’s Disclosure of grand jury testimony of witnesses intended to be called at trial	April 30, 2021
<i>Reciprocal Discovery from Defendants (pursuant to Rule 16(b)(1)(A), (B))</i>	May 14, 2021
Government Rebuttal Expert Disclosures	May 28, 2021
Government Exhibit List/Witness List for case-in-chief	May 28, 2021
Motions in Limine/ <i>Daubert</i> Motions	June 18, 2021
<ul style="list-style-type: none"> • Oppositions • Replies • Hearing 	<ul style="list-style-type: none"> • July 2, 2021 • July 9, 2021 • July 13, 2021
Defense Exhibit List/Witness List for case-in-chief	July 6, 2021
Pre-Trial Conference Statement pursuant to L.R. 17.1-1 (as modified by the above) as well as:	July 6, 2021
<ul style="list-style-type: none"> • Joint Factual Stipulations • Proposed Juror Questionnaires • Proposed Voir Dire Questions • Proposed Jury Instructions • Proposed Verdict Forms 	
FINAL PRE-TRIAL CONFERENCE	July 13, 2021 at 10:00 a.m.
TRIAL	August 9, 2021 at 9:00 a.m. (Jury Trial — Estimate: 4-8 weeks)

SO STIPULATED AND AGREED

Dated: September 30, 2020

Respectfully Submitted,

DAVID L. ANDERSON
United States Attorney

/s/ Nicholas O. Hunter
LAURA VARTAIN HORN
Assistant United States Attorneys

NICHOLAS O. HUNTER
Trial Attorney, National Security Division

¹ All discovery motions based on materials produced to date to be filed by this date.
STIPULATION REGARDING PRE-TRIAL SCHEDULE
CR 18-465 MMC

/s/ Leslie Caldwell
LESLIE CALDWELL
Attorney for Defendant
United Microelectronics Corp., Inc.

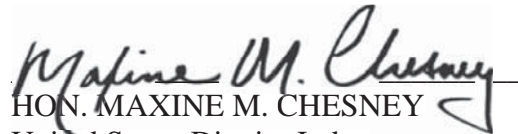
[PROPOSED] ORDER

To provide for the orderly presentation and resolution of pretrial matters, and, having considered ~~Based upon~~ the parties' stipulation and for good cause shown, the Court ORDERS that the pre-trial schedule in this case is as follows:

Event	Date
U.S. shall produce all <i>Brady</i> , <i>Giglio</i> , <i>Jencks</i> (excluding grand jury testimony), and Rule 16(a) Materials (except expert disclosures)	December 21, 2020
Government Expert Disclosures (Rule 16(a)(1)(G))	April 2, 2021
Dispositive and Discovery Motion Deadline (including all Rule 12(b)(3) Motions). ¹	April 23, 2021 April 21, 2021
Briefing and Hearing Schedules on Dispositive and Discovery Motions Oppositions Replies Hearing	May 5, 2021 May 12, 2021 May 26, 2021, at 2:15 p.m.
Defense Expert Disclosures (Rule 16(b)(1)(C))	April 30, 2021
Government's Disclosure of grand jury testimony of witnesses intended to be called at trial	April 30, 2021
<i>Reciprocal Discovery from Defendants (pursuant to Rule 16(b)(1)(A), (B))</i>	May 14, 2021
Government Rebuttal Expert Disclosures	May 28, 2021 May 18, 2021
Government Exhibit List/Witness List for case-in-chief	May 28, 2021
Motions in Limine/ <i>Daubert</i> Motions	June 18, 2021 June 8, 2021
Oppositions	July 2, 2021 June 22, 2021
Replies	July 9, 2021 June 29, 2021
Hearing	July 13, 2021 July 13, 2021
Defense Exhibit List/Witness List for case-in-chief	July 6, 2021
Pre-Trial Conference Statement pursuant to L.R. 17.1-1 (as modified by the above) as well as: Joint Factual Stipulations Proposed Juror Questionnaires Proposed Voir Dire Questions Proposed Jury Instructions Proposed Verdict Forms	July 6, 2021 June 29, 2021
FINAL PRE-TRIAL CONFERENCE	July 13, 2021 at 10:00 a.m.
TRIAL	August 9, 2021 at 9:00 a.m.

IT IS SO ORDERED

DATED: October 2, 2020


HON. MAXINE M. CHESNEY
United States District Judge

¹ All discovery motions based on materials produced to date to be filed by this date.